

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MUSTAFA FTEJA,

Plaintiff,

-against-

FACEBOOK, INC.,

Defendant.

Civil Action No. 1:11-cv-00918 (RJH)(MHD)

**NOTICE OF MOTION TO TRANSFER
VENUE, TO DISMISS, OR
FOR A MORE DEFINITE STATEMENT**

PLEASE TAKE NOTICE that Defendant Facebook, Inc. (“Facebook”), by its undersigned attorneys, shall move before the Honorable Richard J. Holwell, U.S.D.J., at the Courthouse located at the 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order to transfer this case to the Northern District of California under 28 U.S.C. § 1404(a); to dismiss Plaintiff’s complaint under Federal Rule of Civil Procedure 12(b)(6); for a more definite statement of Plaintiff’s claims under Federal Rule of Civil Procedure 12(e); and such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that Facebook shall rely in support of this motion upon the annexed Declaration of Justin Nolan Kinney and the exhibit thereto, the Declaration of Ana Yang and the exhibits thereto, the accompanying memorandum of law, and the pleadings and proceedings herein.

PLEASE TAKE FURTHER NOTICE that no trial date has been scheduled in this matter.

Dated: April 4, 2011

Respectfully submitted,

By: /s/ Justin Nolan Kinney
Justin Nolan Kinney (JK8531)
COUGHLIN DUFFY LLP
Wall Street Plaza
88 Pine Street, 28th Floor
New York, NY 10005
(212) 483-0105
jkinney@coughlinduffy.com
Attorneys for Defendant,
Facebook, Inc.